

**REMARKS**

In the Office action mailed on February 10, 2004, the specification and drawings are objected to, and claims 1–12 are rejected. In particular, claims 1 and 7–9 are rejected under 35 U.S.C. § 112, claims 1, 6, 9–10, and 12 are rejected under 35 U.S.C. 102(e) over U.S. Patent No. 6,366,124 to Alam et al. (“*Alam*”), claims 2 and 7 are rejected under 35 U.S.C. § 103(a) over *Alam*, claims 3–5 are rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 6,125,391 to Meltzer et al. (“*Meltzer*”), claim 8 is rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 6,034,700 to Rumph et al. (“*Rumph*”), and claim 11 is rejected under 35 U.S.C. § 103(a) over *Alam* and U.S. Patent No. 5,278,678 to Harrington et al. (“*Harrington*”).

Applicant traverses the rejections and objections. Applicant cancels claims 3 and 12, adds claims 13–34, and amends the drawings, specification, and claims 1, 4, 5, 7–9, and 11. Support for the new claims can be found at least at page 8, line 7 through page 10, line 9. Applicant submits that no new matter is added by these amendments.

Enclosed herewith is a terminal disclaimer in compliance with 37 CFR 1.321(c) signed by the attorney or agent of record for overcoming the double-patenting rejection, and the required fee under 37 CFR 1.20(d).

Applicant and the undersigned attorney thank Examiners Roswell and Cabeca for their time and attention during the telephonic interview conducted with the undersigned on April 21, 2004. Applicant respectfully requests reconsideration of the claims based upon the foregoing amendments and the following remarks.

The Enclosed Terminal Disclaimer Obviates the Non-Statutory Double Patenting Rejection

As indicated above, Applicant encloses, herewith, a terminal disclaimer in compliance with 37 CFR 1.321(c). Therefore, Applicant respectfully requests withdrawal of the double patenting rejection.

The Corrected Drawings Satisfy the Outstanding Objections

Figures 2 and 3 has been amended to address the outstanding objections. Figure 2 has been amended to clarify the usage of reference numerals 11 and 12. No new matter has been added by way of these amendments. Applicant respectfully submits that the amended figures are in condition for allowance and requests that the objections be withdrawn.

The Specification is Amended to Implement Minor Changes and To Correct Typographical Errors

The specification is amended to replace the British English word “colour” with the American English equivalent “color”. Minor typographical errors are corrected, as well. Applicant submits that no new matter is added by way of these amendments.

Amended Claims 1 and 7–9 Satisfy 35 U.S.C. § 112

Claim 1 is amended to replace the term “said visual display” with the term “said visual image” for which the preceding paragraph of the claim provides antecedent basis. Claims 7–9 are amended to depend upon claim 6 instead of claim 5. Therefore, applicant submits that amended claims 1 and 7–9 are in condition for allowance and requests that the rejection be withdrawn.

Amended Independent Claim 1 Is Patentable Over the Cited References

Amended independent claim 1 relates to a digital document processing system.  
Amended independent claim 1 recites:

A digital document processing system, comprising an adaptable front end for receiving an input stream representing source data in one of a plurality of predetermined data formats and containing information representative of a visual image, wherein the source data defines a content and a structure of a digital document,

an interpreting module for interpreting said input stream to generate an internal representation of said visual image, wherein said internal representation describes said structure separately from said content, and said internal representation further describes said structure in terms of generic objects defining a plurality of data types and parameters defining properties of specific instances of generic objects, and

a rendering engine for processing said internal representation and for generating an output data stream suitable for driving an output device to present the visual image.

Independent claim 1 is amended to include the limitations of now cancelled claim 3. As noted in the Office action, *Alam* does not describe the subject matter of claim 3. Therefore, amended independent claim 1 is patentable over *Alam* under 25 U.S.C. 102(e).

Moreover, Claim 1, as amended, is patentably distinguishable over the combination of *Alam* and *Meltzer*. Neither *Alam* nor *Meltzer*, individually or in combination, teaches, suggests, or describes all elements of cancelled claim 3, now amended claim 1, as required by MPEP § 2143 to demonstrate a prima facie case of obviousness.

As noted in the Office action, *Alam* fails to describe an internal representation of a visual image that describes structure separately from content. This is the explicit subject matter of claim 3 as filed.

*Meltzer* fails to bridge the gap between *Alam* and amended claim 1. *Meltzer* describes the processing of an incoming document by parsing the document, translating the document into the format of the host, and then creating an output document. Col. 26, lns. 19–39. Incoming and output documents are not internal representations. Amended claim 1 explicitly draws a distinction between an input stream, a subsequently generated internal representation, and a

further subsequently generated output stream. Therefore, to the extent that Meltzer describes an internal representation, it can only be the translated document in the host format.

The translation of the document into the host format is described as follows:

In this example, the XML logic structures are translated into JAVA objects which carry the data of the XML element as well as methods associated with the data such as get or fetch.

Col. 26, lns. 26–30. The translated document in the host format is therefore a collection of structures, (“JAVA objects”) that explicitly carry the content, i.e., “the data of the XML element” associated with the structures. This format does not separate structure and content. Instead, it explicitly combines the two, thereby preventing the benefits derived from having an internal representation that separately describes structure and content, for example, allowing “document structures to be defined in a very compact manner and provid[ing] the option for content data to be stored remotely and to be fetched by the system only when needed.” Specification at p. 8, lns. 2–4.

Furthermore, *Meltzer* only describes using XML files for input and output documents. *Meltzer* fails to describe, teach, or suggest the use of XML files for the host format. Extrapolating *Meltzer*’s description of having XML input and output documents into a teaching or suggestion of an internal representation that separately describes the content and structure of a document constitutes impermissible hindsight. MPEP § 2141.

In addition, *Meltzer* and *Alam* cannot properly be combined to support a prima facie obviousness rejection. References cannot be combined to support an obviousness rejection if the combination changes the principle of operation of either of the references. MPEP § 2143.

*Meltzer* provides for business communications and transactions using “predefined, machine readable business documents”. Col. 2, lns. 51–54. *Meltzer* provides for “storing a machine readable specification of an interface for a transaction, the specification includes a

definition of an input document and a definition of an output document.” Col. 3, lns. 22–25. In contrast, *Alam* determines the structure of a document based on the document itself, without being constrained by predefined structures. In particular, *Alam* describes:

locating and storing tags in the input format document at a step 700, locating words from the digital data at step 702, joining the located words into lines at step 704, joining the lines into paragraphs at a step 706, locating tables from the joined paragraphs at a step 708, and outputting the intermediate format data generated from steps 702, 704, 706, and 708 at step 710.

Col. 7, lns 15–21. Combining the references requires *Meltzer* to abandon its use of predefined documents, or requires *Alam* to become constrained to predefined document specifications, either of which change alters the principle of operation of the given reference. it would be improper to combine the references to create a prima facie case of obviousness.

No cited reference or combination of cited references teaches or describes all elements of amended independent claim 1. Moreover, even if the combination of references suggested in the Office action resulted in the claimed subject matter, it is improper to combine those references. Therefore, applicant submits that amended independent claim 1 is patentable over *Alam*, *Meltzer*, *Rumph*, *Harrington*, and any combination thereof. As claims 2, 4–11, and 13–34 depend from amended independent claim 1, applicant submits that claims 2, 4–11, and 13–34 are patentable as well.

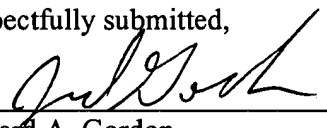
**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-1945, under Order No. PGLD-P01-001 from which the undersigned is authorized to draw.

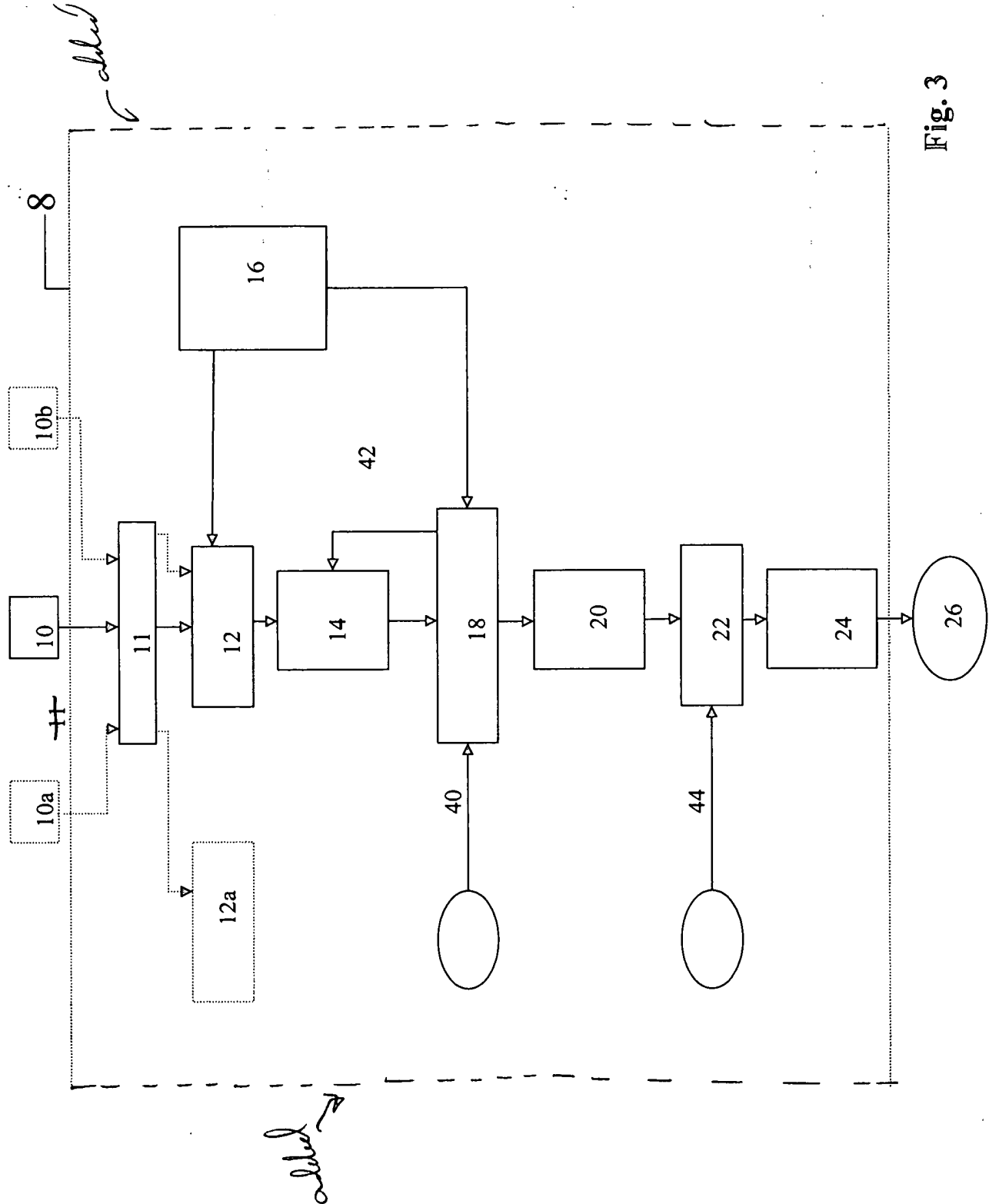
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Respectfully submitted,

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Attachments

3  
Fig.



ANNOTATED SHEET SHOWING CHANGES

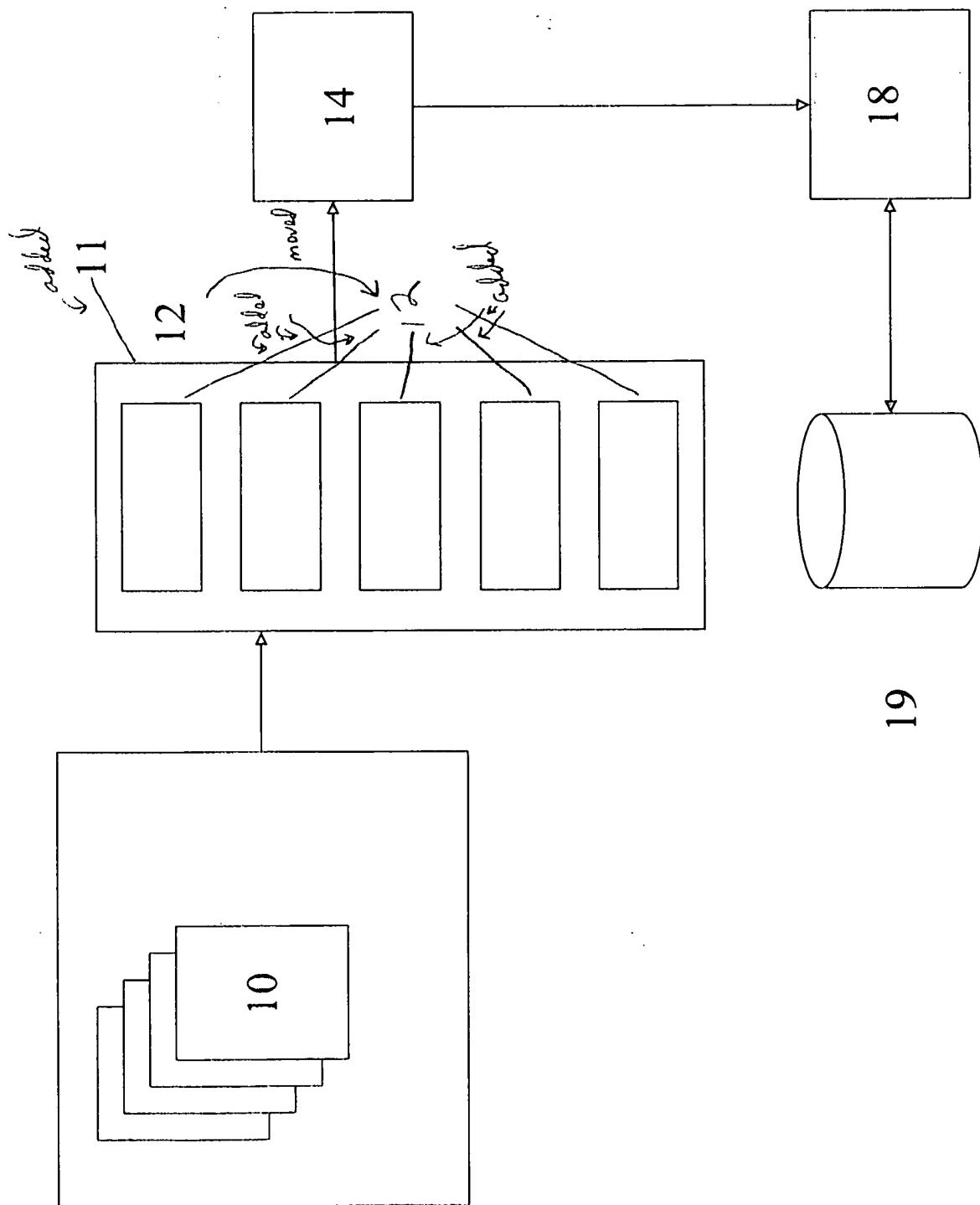


Fig. 2